

CONFIDENTIAL

BEFORE THE

POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

MAILING ONLINE SERVICE

Docket No. MC98-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS LEE GARVEY (DFC/USPS-T1-1-6)

August 3, 1998

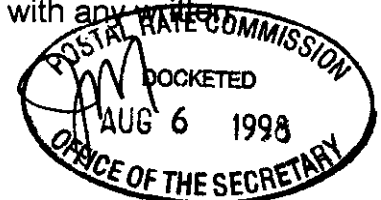
Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness Lee Garvey.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories.

The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, and tapes and recordings used in data processing together with any written



material necessary to understand or use such punch cards, discs, tapes, or other recordings.

"All documents" means each document, as defined above, that can be located, discovered, or obtained by reasonably diligent efforts, including, without limitation, all documents possessed by (a) you or your counsel or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

"Communications" includes, but is not limited to, any and all conversations, meetings, and discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

"Relating to" means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material, whether prepared manually, mechanically, or electronically, without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness' responses and should "show what the numbers were [and] what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an

explanation for each instance in which documents or information cannot be provided or have not been provided.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Douglas F. Carlson", written in black ink.

Dated: August 3, 1998

DOUGLAS F. CARLSON

DFC/USPS-T1-1.

Please refer to your testimony at page 10, lines 2–5.

a. Please confirm that some users of Mailing Online may be unfamiliar with the Address Management System database or concepts of “address hygiene” that govern large-volume mailers’ eligibility for automation discounts. If you do not confirm, please explain the basis for your inability to confirm.

b. Will Mailing Online explain the reason why a particular address is being purged from the list?

c. Will Mailing Online give the customer an opportunity to correct the defect in the address before purging the address?

DFC/USPS-T1-2. Please refer to page 13 of your testimony and define the terms “bulk hybrid providers” and “bulk hybrid mail segment.”

DFC/USPS-T1-3.

Suppose a customer decides on October 22, 1998, that he wishes to send a mailing out as soon as possible via Mailing Online.

a. How will this customer determine the earliest date on which his proposed mailing can be printed and mailed?

b. What is the minimum amount of lead time — expressed in hours or days — that a customer must allow for the smallest possible mailing to be printed and mailed?

c. Please define and describe a few hypothetical mailings — both large and small, with some requiring complicated finishing — and provide estimates of the amount of time that will be required for the printing and mailing of these various types of mailings after the customer completes his order on-line.

DFC/USPS-T1-4. Will Mailing Online always tell the customer at the time of placing the order the date on which the order will be mailed?

DFC/USPS-T1-5.

- a. Please describe the financial or other recourse, if any, that a customer will have if his order is not mailed by the promised date and time. Please explain the process by which a customer will pursue this recourse.
- b. Please describe the financial or other recourse, if any, that a customer will have if his order is not prepared or mailed properly (e.g., if printing or finishing errors exist or the order is sent using the incorrect class of mail). Please explain the process by which a customer will pursue this recourse.
- c. Please explain the process by which printing contractors will monitor the job to ensure that every document is printed, finished, and mailed correctly.
- d. Please describe the quality-control procedures that the Postal Service will require of printing contractors.
- e. Will the Postal Service require the printing contractors to inspect a certain number or percentage of the finished output to evaluate the accuracy of the job? If not, why not?
- f. Please explain how the Postal Service will monitor contractors' compliance with any required quality-control procedures.
- g. Will the customer receive a notification after his order has been mailed to confirm that the order has, in fact, been printed and mailed? If so, please describe how this confirmation will be transmitted to the customer.
- h. Will the Postal Service provide a dedicated toll-free telephone number for customers to use to obtain assistance with Mailing Online?

DFC/USPS-T1-6.

- a. Will a customer have an option of having a single-sheet order mailed as a flat?
- b. What is the maximum number of 8½" x 11" sheets that a customer will be able to have mailed in a #10 envelope?

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.

A handwritten signature in cursive script, appearing to read "Douglas F. Carlson", written over a horizontal line.

DOUGLAS F. CARLSON

August 3, 1998
Emeryville, California